

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

**EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,**

Plaintiff,

V.

**V8 MOTORS, LLC d/b/a
VICARS POWERSPORTS,**

Defendant.

Case No. 23-cv-299-JAR

JOINT MOTION TO STAY ALL REMAINING DEADLINES

Plaintiff, Equal Employment Opportunity Commission, and Defendant, V8 Motors LLC d/b/a Vicars Powersports, respectfully request the Court Stay all remaining deadlines for thirty (30) days to provide the parties an opportunity to finalize a settlement agreement concerning the above captioned case. In support, the parties show the Court as follows:

1. Following written discovery, the parties attended mediation on February 22, 2024, where an agreement was reached on monetary relief, contingent on reaching a final agreement on the terms of a consent decree – which, if reached, the parties will submit to this Court for approval and entry.

2. The parties are optimistic that they can reach a final agreement on a consent decree. The parties believe that thirty (30) days should be sufficient to finalize the consent decree terms.

3. In the event that an agreement cannot be reached the parties will be required to conduct significant discovery. To save time and costs, focus their efforts on resolving this matter, and to avoid the prejudice of time lost for discovery should these efforts fail, the parties respectfully request a thirty (30) day stay of all deadlines.

4. Within thirty (30) days of the entry of a stay, the parties will either jointly move this Court for entry of their approved consent decree, seek an extension of the stay as necessary under the circumstances, or provide the Court notice of the need to enter an updated scheduling order with all remaining deadlines extended by thirty (30) days.

5. A proposed order granting the requested relief is submitted contemporaneous with this motion.

Respectfully submitted,

s/ Patrick J. Holman

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s/ Paige H. Good

(e-signed with permission) -

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